

February 10, 2021

Alain Miguelez
Manager, Policy Planning
City of Ottawa

Sent via email at Alain.Miguelez@ottawa.ca

Copy to: jim.watson@ottawa.ca, mfleury@ottawa.ca, newop@ottawa.ca

Re: Lowertown Community Association Comments on Draft Official Plan

Dear Mr. Miguelez,

The Lowertown Community Association reviewed the draft official plan. We care deeply about the future of Ottawa, and recognize that this plan “provides a vision for the future growth of the city and a policy framework to guide the city’s physical development” until 2045. As such, we share concerns of others in coalitions such as the People’s Official Plan, CAFES and FCA that the plan does not take into account the impact of the COVID-19 pandemic on the urban fabric of Ottawa, and particularly in Lowertown and neighbouring downtown wards. We are also concerned that it does not move far enough and fast enough on the housing and homelessness emergency nor the climate emergency. While we certainly share the goal of becoming the most livable mid-sized city in North America, the plan must be bolder to get us there.

We support many of the policies outlined in the draft document particularly regarding the city’s intention to no longer pursue widenings of Highway 417 within the urban area, to protect the rental housing stock and to permit housing for vulnerable groups in all residential zones. We however have many serious concerns that we outline below.

Inter-provincial Crossing

It is extremely disappointing that after almost 60 years following the construction of a major inter-provincial truck route through Lowertown and downtown Ottawa, the draft OP only commits to “collaborate” with other agencies to identify future crossing(s) to relocate the interprovincial truck route away from downtown. The draft plan should at least ensure that right-of-way corridors are protected for future interprovincial crossing(s). As a minimum, one or more corridors, including the Kettle Island corridor, should be shown in one of the annexes. We suggest adding “interprovincial crossings” to the following policy: “2) *The City shall protect lane, street, road and rail rights-of-way and utility corridors for potential future transportation purposes, such as active transportation, rapid transit, “inter-provincial crossings”, inter-regional passenger rail and high-speed rail.*”

In the meantime, as a mitigation measure, we suggest the city manage truck size by limiting access to King-Edward to trucks with a maximum of 12 wheels to minimize the impact on the downtown core.

The ByWard Market Special District – Need for a Secondary Plan

This section is taken almost entirely from the ByWard Market Public Realm Plan and cements what was to apply to 40% of the area into the new OP vision for 100% of the ByWard Market without proper consultation. Essentially, the draft policies encourage cultural programming, patios, nightlife and commercial activities. There are no policies encouraging the farmer's market or small retailers and no acknowledgement that hundreds of people live in the Market. This vision does not take into account the many problems facing the ByWard Market and it is a significant departure from the current secondary plan without consultation.

In February 2012, the heads of the LCA, the BIA and the Safety and Security Committee asked the Mayor for a visioning exercise to deal with the future of the Market because of serious concerns about safety and security, the concentration of the homeless population, the proliferation of bars and the loss of food retailers. The request was denied. Since then, problems have gotten worse. The city cannot now use the Public Realm Plan as the community's vision for the Market without an appropriate consultation. Since the draft OP eliminates the current secondary plan, the LCA requests a City-organized community visioning exercise and secondary plan, to articulate a proper vision for this area's future development. This should be done in conjunction with the two heritage plans in Lowertown.

The Lowertown Community Association conducted its own visioning exercise in 2020 which did not see the Market as a major entertainment district but as a mixed-use area surrounding a vibrant year-round fresh food market, small unique retailers, offices and residences within an environment that prioritizes pedestrians. Residents see the Market as an exceptional destination to buy the best quality and variety of local food produce and unique products from small boutiques within the most historic district of Ottawa.

This section needs to acknowledge that the historic farmer's market is the heart and economic cornerstone of the area and that it should be protected and enhanced. It also needs to recognize throughout that there is a diversity of users that includes not only visitors, office workers, a variety of small retailers but the many residents who live on George, York, Clarence, Murray and St-Patrick. All

the important decisions pertaining to the Market area should balance the needs of all users including residents.

The word “entertainment” needs to be replaced by “mixed use” and each policy needs to be reviewed to consider the livability of residents. For example, saying in paragraph b) that the role of Clarence is to accommodate patios ignores the fact that this street is home to many residents and small retailers not just bars and restaurants with patios. We suggest deleting this statement.

Strategic Directions

The draft OP recognizes that Ottawa is made up of neighbourhoods and villages with distinct characters and introduces transects that are intended to be treated differently. The LCA suggests adding a specific policy that directs staff to ensure that all city By-laws regulating a multiplicity of endeavours such as patios on rights-of-ways, digital signage on private property etc. reflect this intent and move away from the “one size fits all” strategy applied since amalgamation in 2001.

Quality of Life, Healthy, Walkable, 15-Minute Neighbourhoods

The draft OP talks about enhancing Ottawa’s high quality of life and livability as a major attraction for Ottawa but development decisions never take into account preserving the quality of life of residents. We suggest adding a policy about considering and protecting the quality of life of residents when making planning decisions. We also suggest adding a definition of “livability”. If the city is serious about encouraging “regeneration” and 15-minute neighbourhoods, it should set some metrics, some criteria and monitoring indicators regarding what is considered a livable environment.

We welcome the proposed “Major Changes” report but it must be timely and substantive, especially regarding policies related to more density, more vibrant neighbourhoods and more transportation choices for “15-minute neighbourhoods”

While we welcome the references to active transportation, as the Draft Official Plan has the stated intention of “[providing] a transportation network that prioritizes sustainable modes over private vehicles” (p. 44). The plan also states that “convenience and safety for pedestrians, cyclists and transit users shall take absolute priority over private motor vehicle access and movement in the Downtown Core” (p. 130) yet it maintains the centrality of the road network. We urge noting that all road-widenings and expansions (municipal and provincial) pose a threat to the realization of transformation to the 15-minute city.

Notably the Draft Official Plan does not contain mode share targets, despite various policy directions in favour of active transportation. We urge the city to insert a reference to ambitious, measurable mode share targets as part of a city-wide strategy, with more detail to be added in the upcoming Transportation Master Plan. Lastly, Lowertown has suffered hundreds of deaths and injuries by trucks and motor vehicles. We are surprised by the absence of a reference to Vision Zero, despite many efforts by citizens and Councilors recently and we urge inserting a reference to eliminating death and serious injury on Ottawa's roads as part of its transportation strategy, with more detail to be added in the upcoming Transportation Master Plan.

Housing

There is an overconcentration of shelters and services for vulnerable people in Lowertown. The LCA applauds the city's intention to allow housing for vulnerable people in all residential neighbourhoods. However, more should be done to spread services and housing options to vulnerable people across the city.

The draft OP lists a number of big incentives and direct support to promote affordable housing for low- and moderate-income households such as density bonusing, density transfer, deferral or waiving of fees and charges, alternative development standards, land, more flexible zoning that allows for a greater number of units and application processing priority. However, giving bonuses and incentives to builders does not guarantee that the units will remain affordable. Rather than paying developers to build affordable units, the city should establish a percentage of units to be affordable, such as 30%, in large developments and work with the non-profit sector to buy these units so they remain affordable. We would like to see a stronger commitment for inclusionary zoning as well as incentives such as tax rebates for homeowners to create accessory dwellings. Also, all LRT and all transitway stations, should be included in the Protected Major Transit Station Areas defined in Schedule C1 (where inclusionary zoning may apply), not just a small selection of them, as now shown.

In terms of addressing the related housing and climate crises, the draft Official Plan continues to emphasize new construction over retrofitting existing buildings, Instead Ottawa could seize the opportunity to address Ottawa's largest single source of greenhouse gas emissions, heating, cooling and electrifying our buildings, by retrofitting existing buildings. Despite Ottawa council's direction through the [Climate Change Master Plan](#), the draft Official Plan provides no such policy direction in support of a comprehensive housing and energy strategy.

4.2.1 2) could read:

The City shall support the production of a missing middle range of mid-density, low-rise multi-unit housing in both higher performance new buildings and deep energy retrofits of existing buildings, in order to support the evolution of healthy walkable 15-minute neighbourhoods and corresponding 15-minute neighbourhoods around key hubs and corridors.

Given the impacts of COVID-19, Ottawa should re-evaluate office space needs and explore converting some to larger family dwellings so that densification in Lowertown and the core is more accessible for families.

Energy and Climate Change

While pleased to see recognition of the impacts of climate change and some policies, the lack of influence and connection to the Climate Change Master Plan (CCMP) is notable. Through the CCMP the City committed to “Apply a climate lens to the new Official Plan” yet it is unclear how a climate lens has been applied and it is unclear how the Official Plan will enable the achievement of the Energy Evolution goal of zero carbon by 2050 and Energy Evolution’s more immediate 2025 and 2030 targets. Key Energy Evolution targets should be established, such as 100% of new homes are net zero emissions by 2030, and 100% of new commercial buildings are near net zero emission-ready after 2030.

As for the other major contributor to greenhouse gas emissions, transportation, the plan contains strong language on shifting away from cars as the dominant mode of transportation, yet it continues to maintain the supremacy of the road network, prioritizing cars over people. We would welcome additions from Energy Evolution targets, such as active transportation mode share is 21% by 2030 and 100% of the transit fleet is zero emission by 2030.

2.2.3 (4) under Energy and Climate Change notes the desire to enable the use of local renewable energy resources (p.27). This provides an opportunity to add - **reduce construction waste by recycling and reusing materials generated by demolitions and to review demolition applications and audits to ensure that the waste management plan is accurate and provides for optimal recycling and reuse.**

4.6.4 Re Policy 3) Ottawa should petition the Province to receive the same provision in the City of Ottawa Act as is found in the City of Toronto Act to give it the authority to require green roofs.

Bounded by Ottawa's two rivers, we welcome the commitment 4.9.2 "Keep watercourses in a natural state while managing erosion, slope stability and flooding concerns" As Ottawans well know, flooding is the now the costliest type of natural disaster in Canada. We must do more than 'avoid' building in floodplains. 4) should include that a proposed development will be prohibited if it does not meet specific standards. Stronger shoreline protection measures should also be included in the Official Plan and would help avoid the City of Ottawa incurring flood damage costs in future.

Parks

Section 4.4.3 of the draft plan promises to provide new parks in the downtown core and inner urban area but it is not clear how the City will ensure that park development will meet the needs and demands of a growing population in the downtown core where land is scarce. Prioritizing land for parks on-site over cash-in-lieu of parkland is positive but may not be enough to meet the needs of a growing population expected to live in higher density environments such as in Lowertown. We suggest establishing targets and a financing mechanism to ensure that adequate funds will be available for the maintenance and improvement of existing and new parks in the future. We also suggest adding that in the Downtown Core and Inner Urban Area the full amount of cash-in-lieu be allocated to the areas where development occurs rather than for city-wide initiatives.

This section needs to be strengthened by including stronger wording such as in 4.4.1.9. "*Council may consider City-owned properties...*", the word 'may' should be replaced by 'shall'; in 4.4.3.1. "*To provide new parks...the City will consider...*" the verb 'will consider' should be replaced by 'shall'; in 4.4.3. f) "*Privately-owned public spaces may be considered when City ownership is not feasible*", the word 'may' should be replaced by 'must'; in 4.4.6.1.e).

Heritage

Section 5 on Transects places Lowertown in the Downtown Core and identifies Hubs and Corridors in this transect where a minimum of two storeys and maximum of twelve storeys will be allowed. As written, this would apply to King Edward Avenue where a significant portion falls within the Lowertown West HCD and to Dalhousie Street which is almost entirely with the two HCDs. The LCA would like to see more explicit language indicating that the HCDs take precedence over height considerations.

In 5.6.1.1, the LCA requests an addition to include HCD properties and Heritage Register properties in Section (4) "*Where an Overlay is applied to a property that is identified as a heritage resource **or an***

HCD or on the Heritage Registry, the property is also required to conform to the relevant heritage policies.”

Section 6.6.4 (3 e) needs to strengthen the HCD protection of Dalhousie Street with the following addition: *“Development along Dalhousie Street shall be consistent with the policies with respect to the Lowertown West and ByWard Market Heritage Conservation District Plans.”*

Also, all definitions, including the ones related to heritage and affordable housing should align with the *Provincial Policy Statement 2020*.

Urban Design

In 4.6.6 on compatible development of low-rise, mid-rise and high-rise buildings, we suggest adding the requirement that new buildings have a transparent façade at grade to enhance the pedestrian experience. We also suggest that mechanical equipment be included in the overall permitted height of new buildings as too often a couple or more storeys are added for that purpose.

To implement greater intensification then City should increase the minimum height now set at two stories in the downtown core for neighbourhoods, minor corridors, and main street corridors. Allowing 2 story buildings beside high rises will miss important intensification opportunities and continue to create unappealing streetscapes. We suggest using the facades of new buildings to produce harmonious and continuous streetscapes by requiring higher minimum heights as well as reduced maximum heights with minimum space in between buildings. Additionally, encouraging the use of internal courtyards would allow for natural light, cross ventilation, greenery and reduced noise from the street. Retail spaces on street level will enliven the streets and create the services needed for a 15 minute community.

Rural Designations

Given the importance of the ByWard Farmers’ Market in our community and ensuring food security, the Rural designations sections could be improved to support local agriculture and economy as well as address climate change. We suggest the following changes:

*9.1.2 Support diversification of farming operations to increase local supply of food products and services in the **context of a regional economy***

*9.1.3 Support agriculture-related **and renewable energy uses (of Agricultural Resource Area)** to keep services needed by the farming community close to market.*

Add a policy to increase support for the local marketing of farm products.

In Conclusion

The draft OP contains a series of often worthy goals that lack clarity on prioritization between competing or overlapping goals. There is also a lack of reference to community engagement in the implementation section. We would like the city to ensure a stronger role for communities in the future development of Ottawa. To that end, we hope you will take into consideration our requests and suggestions.

We have covered most of our major concerns above, however the complexity of the draft OP will require more time to digest, and the LCA may be sending further comments later.

Sincerely,

A handwritten signature in black ink, appearing to read "Norman Moyer", with a long horizontal flourish extending to the right.

Norman Moyer
President
Lowertown Community Association